

EXHIBIT H

NORTH CAROLINA
COUNTY OF DURHAM

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
16-CVS _____

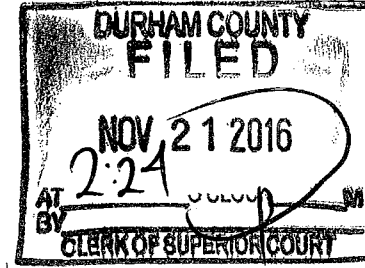
IRIS POUNDS, CARLTON MILLER,)
VILAYUAN SAYAPHET-TYLER,)
RHONDA HALL and PIA TOWNES,)
on behalf of themselves and all others)
similarly situated,)

Plaintiffs,)

v.)

PORTFOLIO RECOVERY)
ASSOCIATES, LLC)

Defendant.)



PLAINTIFFS' NOTICE OF FILING

Iris Pounds, Carlton Miller, Vilayuan Sayaphet-Tyler, Rhonda Hall and Pia Townes, by and through undersigned counsel, and hereby give notice of filing and service of Exhibits 1-69 of Exhibits in Support of Plaintiffs' Motion for Preliminary Injunction and Plaintiffs' Motion for Class Certification, as follows:

A. Affidavits of Named Plaintiffs

- Ex. 1. Affidavit of Iris Pounds
- Ex. 2. Affidavit of Carlton Miller
- Ex. 3. Affidavit of Vilayuan Sayaphet-Tyler
- Ex. 4. Affidavit of Rhonda Hall
- Ex. 5. Affidavit of Pia N. Townes

B. Court Files for Named Plaintiffs' Default Judgment Cases

- Ex. 6. *PRA v. Pounds* (Durham 15-CVD-4120)
- Ex. 7. *PRA v. Miller* (Durham 14-CVD-2019)
- Ex. 8. *PRA v. Sayaphet-Tyler* (Guilford 15-CVD-5238)

- Ex. 9. *PRA v. Sayaphet-Tyler* (Guilford 15-CVD-9301)
- Ex. 10. *PRA v. Hall* (Mecklenburg 15-CVD-1907)
- Ex. 11. *PRA v. Townes* (Mecklenburg 15-CVD-1909)
- Ex. 12. Authenticating Affidavits

C. Eight-County Sample of 367 PRA Default Judgment Court Files

- Ex. 13. Affidavit of Seonaid Rijo Regarding File Selection
 - A. List of Cases by County
 - B. Case Number Selection Chart
- Ex. 14. Affidavit of Karen Ewart Regarding Eight-County Sample
 - A. List of Cases by County
 - B. Chart Summarizing 367 Court Files
 - C. List of Cases Deleted
- Ex. 15. Summary of Eight-County Sample: Authentication
- Ex. 16. Summary of Eight-County Sample: Itemization
- Ex. 17. Summary of Eight-County Sample: Sessoms Attorney Affidavits
- Ex. 18. Authenticating Affidavits

D. Summary of Court Files for Named Plaintiffs' and Vacatur Cases

- Ex. 19. Affidavit of Karen Ewart Summarizing Named Plaintiffs' and Vacatur Court Files
 - A. List of Files
 - B. Chart Summarizing Named Plaintiffs' and Vacatur Files
- Ex. 20. Summary of Named Plaintiffs' and Vacatur Files: Authentication
- Ex. 21. Summary of Named Plaintiffs' and Vacatur Files: Itemization
- Ex. 22. Summary of Named Plaintiffs' and Vacatur Files: Sessoms Attorney Affidavits
- Ex. 23. Authenticating Affidavits

E. Vacatur Orders and Hearing Transcript

- Ex. 24. Order, *PRA v. Brady* (Chatham 15-CVD-44) (Dec. 18, 2015)
- Ex. 25. Order, *PRA v. Peach* (Wake 15-CVD-4745) (Mar. 29, 2016)
- Ex. 26. Order, *PRA v. Spector* (Mecklenburg 14-CVD-22005) (June 8, 2016)
- Ex. 27. Order, *PRA v. Pledger* (Mecklenburg 14-CVD-22008) (June 8, 2016)
- Ex. 28. Order, *PRA v. Townes* (Mecklenburg 15-CVD-1909) (June 8, 2016)
- Ex. 29. Order, *PRA v. Walters* (Mecklenburg 15-CVD-2893) (June 8, 2016)
- Ex. 30. Order, *PRA v. Walls* (Mecklenburg 15-CVD-15284) (June 8, 2016)

- Ex. 31. Transcript, Hearing Before the Honorable Becky T. Tin, District Court Judge, Judicial District 26 (May 4, 2016)
- Ex. 32. Authenticating Affidavit

F. PRA Voluntary Dismissals in Vacatur Cases

- Ex. 33. Notice of Dismissal, *PRA v. Brady* (Chatham 15-CVD-44) (Dec. 31, 2015)
- Ex. 34. Notice of Dismissal, *PRA v. Peach* (Wake 15-CVD-4745) (Apr. 7, 2016)
- Ex. 35. Notice of Dismissal, *PRA v. Spector* (Mecklenburg 14-CVD-22005) (June 13, 2016)
- Ex. 36. Notice of Dismissal, *PRA v. Pledger* (Mecklenburg 14-CVD-22008) (June 13, 2016)
- Ex. 37. Notice of Dismissal, *PRA v. Townes* (Mecklenburg 15-CVD-1909) (June 13, 2016)
- Ex. 38. Notice of Dismissal, *PRA v. Walters* (Mecklenburg 15-CVD-2893) (June 13, 2016)
- Ex. 39. Notice of Dismissal, *PRA v. Walls* (Mecklenburg 15-CVD-15284) (June 13, 2016)
- Ex. 40. Authenticating Affidavit

G. Other PRA District Court Case Files

- Ex. 41. *PRA v. Stancil* (Cumberland 15-CVD-8597)
- Ex. 42. *Palmer v. PRA* (Wake 16-CVD-8165)
- Ex. 43. Authenticating Affidavits

H. Excerpts from *PRA v. Houston* (Iredell 12-CVS-642)

- Ex. 44. Ms. Houston's Motion for Summary Judgment (Nov. 25, 2013)
- Ex. 45. Order Granting Summary Judgment (June 2, 2014)
- Ex. 46. Excerpt from PRA's Brief in Opposition to Ms. Houston's Motion to Amend and/or Intervene (Feb. 2, 2015)
- Ex. 47. Order Denying Ms. Houston's Motion to Amend and/or Intervene (June 3, 2015)
- Ex. 48. Authenticating Affidavit

I. *In re Portfolio Recovery Associates, LLC* (United States Consumer Financial Protection Bureau, File No. 2015-CFPB-0023)

- Ex. 49. Consent Order
- Ex. 50. Stipulation
- Ex. 51. Authenticating Affidavit

J. PRA North Carolina Purchases and Case Filings

- Ex. 52. PRA Form 10-K Annual Report Excerpts 2007-2015
- Ex. 53. Authenticating Affidavit
- Ex. 54. Summary of PRA Purchases of NC Accounts 2008-2015
- Ex. 55. Affidavit of Allan Freyer Regarding Summary of PRA Purchases
- Ex. 56. Affidavit of Seonaid Rijo Regarding PRA Filings in Four Counties 2009-2012

K. News Articles Regarding 2009 North Carolina Law

- Ex. 57. Andrew Martin, *Automated Debt-Collection Lawsuits Engulf Courts*, N.Y. TIMES, July 12, 2010
- Ex. 58. Carter Dougherty, *Debt Collectors Lobby to Block Tougher State Documentation Rules*, BLOOMBERG, Sept. 21, 2011
- Ex. 59. Authenticating Affidavits

L. Sessoms & Rogers Website and Articles

- Ex. 60. Firm Profile and Web Page
- Ex. 61. Lee C. Rogers, *North Carolina Debt Collection Laws*; THE NATIONAL LIST OF ATTORNEYS, Jan. 2013
- Ex. 62. Andrew Hoke, *NC's Controversial Debt Buyer Law: Part of the Changing Collection Landscape*, THE NATIONAL LIST OF ATTORNEYS, Aug. 16, 2016
- Ex. 63. Authenticating Affidavit

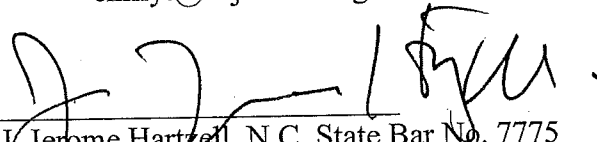
M. Affidavits of Counsel Regarding Qualifications

- Ex. 64. Affidavit of Carlene McNulty, Esq.
- Ex. 65. Affidavit of J. Jerome Hartzell, Esq.
- Ex. 66. Affidavit of Jason Pikler, Esq.
- Ex. 67. Affidavit Emily Turner, Esq.
- Ex. 68. Affidavit of Travis Collum, Esq.
- Ex. 69. Affidavit of Adrian Lapas, Esq.

This, the 21st day of November, 2016.



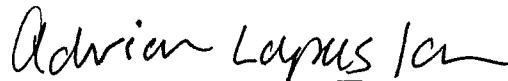
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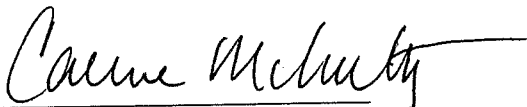
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CERTIFICATE OF SERVICE

The undersigned certifies that on this date a true and correct copy of the foregoing *Notice of Filing* was served, in conjunction with service of the Summons and Complaint, pursuant to Rule 4(j)(6)(d) of the North Carolina Rules of Civil Procedure, upon the Registered Agent for Defendant Portfolio Recovery Associates, LLC, by Federal Express, a designated delivery service authorized under G.S. 1A-1, Rule 4(j)(1)(d) and 26 U.S.C. § 7502(f)(2), delivery receipt and direct signature requested, postage prepaid, addressed as follows:

Corporation Service Company, as Registered Agent for
Portfolio Recovery Associates, LLC
327 Hillsborough Street
Raleigh, NC 27603-1725

This, the 21st of November, 2016



Carlene McNulty